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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

Johnny Wheatcroft and Anya Chapman, as  
husband and wife, and on behalf of minors  
J.W. and B.W.,

Plaintiffs,

v.

City of Glendale, a municipal entity; Matt  
Schneider, in his official and individual  
capacities; Mark Lindsey, in his official and  
individual capacities; and Michael Fernandez,  
in his official and individual capacities,

Defendants.

NO. 2:18-cv-02347-SMB

**JOINT MOTION FOR  
PROTECTIVE ORDER**

The parties jointly move for a Protective Order since the City of Glendale, Matt Schneider, Mark Lindsey and Michael Lindsey (collectively “Defendants”) will produce certain items, information, and documents that contain the identity of a police officer who is the complainant in an internal workplace harassment complaint within the Glendale Police Department (“Officer”). The parties agree that the Officer’s identity shall remain confidential and not available for dissemination to the general public, including the media, but instead shall remain confidential, known by and shared only with this Court and its staff, the parties, their respective attorneys, representatives, agents, consultants, and experts involved in this lawsuit, and any trial witness or deponent during the course of their testimony. The documents containing the Officer’s identity include disciplinary memos, audio recorded interviews and transcripts of interviews, complaint reports,

1 complaints, allegations summaries, Notices of Investigation, and an event timeline related  
2 to Complaint No. 2017-055 (“Confidential Items”).

3 Due to the nature of these Confidential Items and pursuant to their  
4 agreement, the parties jointly request that the Court enter the attached proposed Protective  
5 Order, which sets forth the procedure for the handling of such confidential information  
6 during the course of this litigation. The parties have agreed to the terms set forth in the  
7 proposed Protective Order.

8  
9 DATED this 20 day of May 2019.

10 ATTORNEYS FOR FREEDOM

JONES, SKELTON & HOCHULI, P.L.C.

11 By /s/ Jody L. Broaddus (with permission)

By /s/ Joseph J. Popolizio

12 Marc J. Victor  
13 Jody L. Broaddus  
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### 15 CERTIFICATE OF SERVICE

16 I hereby certify that on this 20th day of May 2019, I caused the foregoing  
17 document to be filed electronically with the Clerk of Court through the CM/ECF System  
18 for filing; and served on counsel of record via the Court’s CM/ECF system.  
19

20 I further certify that on 20th day of May 2019, I have served the forgoing  
21 documents to the following:

22 Marc J. Victor  
23 Jody L. Broaddus  
24 Attorneys for Freedom  
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25 Marc@AttorneyForFreedom.com  
Jody@AttorneyForFreedom.com  
26 Attorneys for Plaintiffs

27 /s/Melissa Ward